

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

COMMUNITY ECONOMIC  
DEVELOPMENT CENTER OF  
SOUTHEASTERN MASSACHUSETTS,

Plaintiff,

vs.

INTERNAL REVENUE SERVICE, and  
SOCIAL SECURITY ADMINISTRATION,

Defendant.

Civil Action No.: 1:25-CV-11949

**DECLARATION OF JOSHUA ROSENTHAL IN OPPOSITION TO DEFENDANTS'  
MOTION TO DISMISS OR, IN THE ALTERNATIVE, FOR SUMMARY JUDGMENT**

I, Joshua Rosenthal, hereby declare as follows:

1. I am an attorney licensed to practice in California, New York, and the District of Columbia, and have been admitted *pro hac vice* in this District in connection with this matter. See Doc. No. 16. I am an attorney at Asian Law Caucus in San Francisco, California, and am counsel of record for Plaintiff. I make this declaration in support of Plaintiff's Cross-Motion for Partial Summary Judgment and in opposition to Defendant's Motion to Dismiss or, in the alternative, for Summary Judgment. I have personal knowledge of the following facts and, if called as a witness, I could and would testify competently thereto.

2. Attached to this declaration as **Exhibit A** is a true and correct copy of a New York Times News article by Alexandra Berzon, Hamed Aleaziz, Nicholas Nehamas, Ryan Mac and Tara Siegel Bernard titled, Social Security Lists Thousands of Migrants as Dead to Prompt Them to 'Self-Deport', dated April 10, 2025. This article was referenced in Plaintiff's request and is available at: <https://www.nytimes.com/2025/04/10/us/politics/migrants-deport-social-security-doge.html>.

3. Attached to this declaration as **Exhibit B** is a true and correct copy of email correspondence between myself and counsel for Defendant, dated September 26, 2025. Although there is a typographical error in this correspondence, I believe that the meaning was inferable from the context, and Defendant's counsel did not ask for clarification.

I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted,

Dated: December 5, 2025

By: /s/ Joshua Rosenthal  
Joshua Rosenthal (*Admitted Pro Hac Vice*)  
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*Counsel for Plaintiff Community Economic  
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**CERTIFICATE OF SERVICE**

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail.

/s/ Joshua Rosenthal  
Joshua Rosenthal